



# OSBORN LAW P.C.

---

Daniel A. Osborn, Esq.  
Lindsay M. Trust, Esq.

43 West 43<sup>rd</sup> Street, Suite 131  
New York, New York 10036  
Phone: 212-725-9800  
Facsimile: 212-500-5115

Email: [info@osbornlawpc.com](mailto:info@osbornlawpc.com)  
[www.osbornlawpc.com](http://www.osbornlawpc.com)

August 3, 2021

**VIA ECF**

Honorable Robert W. Lehrburger  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Gould v. Commissioner of Social Security*,  
Civil Action No. 1:20-cv-10798-RWL

Dear Judge Lehrburger,

We write on behalf of plaintiff, Nicole Corsi Gould, and with the consent of the defendant, to request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on August 10, 2021. Plaintiff respectfully requests an extension of time up to and including October 9, 2021. This is plaintiff's first request for an extension.

Subject to the approval of the Court, the parties propose the following revised briefing schedule to the Court's June 30, 2021 Scheduling Order:

- a. Plaintiff's settlement proposal was served on **July 20, 2021**;
- b. Parties shall either: (a) electronically file a stipulation dismissing, remanding, or otherwise resolving the case; or (b) electronically file a joint letter advising the Court that the parties have complied with the requirements of paragraph a and b of the June 30, 2021

Honorable Robert W. Lehrburger  
August 3, 2021  
Page 2

Scheduling Order but were unable to resolve the case and are proceeding to brief their respective positions by **August 20, 2021**;

- c. Plaintiff to serve her motion for judgment on the pleadings on or before **October 9, 2021**;
- d. Defendant to serve its response/cross-motion on or before **December 8, 2021**; and
- e. Plaintiff to serve her reply (if any) on or before **December 29, 2021**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
Daniel A. Osborn  
OSBORN LAW, P.C.  
43 West 43<sup>rd</sup> Street, Suite 131  
New York, New York 10036  
Telephone: 212-725-9800  
Facsimile: 212-500-5115  
dosborn@osbornlawpc.com

cc: Susan Colleen Branagan, Esq. (by ECF)

SO ORDERED:

8/3/2021

  
\_\_\_\_\_  
HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE